

DOCKET FILE COPY ORIGINAL

From: LESLIE GROSS <LGROSS@lawyerscomm.org>
To: K1DOM.K1PO2(RMULLER)
Date: Thu, Apr 22, 1999 10:00 AM
Subject: FWD: Returned mail: Cannot send message within 3 days

This e-mail is written at the direction of Rosemary Muller of the FCC. On April 15, 1999, our organization tried to file its reply comments electronically in the 98-204 proceeding. Our system attempted to send the e-mail for three days without success. I have since sent you a copy of the return mail message. I have spoken with Rosemary Muller at the ecfs help line and have stated that we have had our reply comments for the 98-204 proceeding since April 15, are anxiously waiting to file them, and are willing to file paper copies at moment's notice. Please let me know what I can do to expedite this process and have our reply comments timely filed. I would like the Secretary's Office to allow our organization to have our comments timely filed.

Leslie M. Gross
Attorney
Lawyers' Committee for Civil Rights Under Law
1450 G Street, N.W., Suite 400
Washington, DC 20005
(202) 662-8322

==== Original Message from MAIL@SMTP (Mail Delivery Subsystem)
{Mailer-Daemon@fccsun05w.fcc.gov} at 4/18/99 8:24 pm
>The original message was received at Thu, 15 Apr 1999 20:12:51 -0400 (EDT)
>from firewall-user@internet2.fcc.gov [165.135.0.253]

> ----- The following addresses had permanent fatal errors -----

><ecfs@fccsun05w.fcc.gov>

> ----- Transcript of session follows -----
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> ----- Original message follows -----

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*ECFS
Problem*

*98-204
96-16*

RECEIVED

APR 15 1999

**FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY**

No. of Copies rec'd 0
List A B C D E

>
> This is the preamble of a multipart MIME formatted message.
> If you are reading this text your mail system is most likely
> not capable of properly decoding MIME messages. To extract
> the contents of this message, save it to a file and then use
> an external MIME decoding utility.
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><STATE> DC
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><LAW-FIRM> Lawyers' Committee for Civil Rights Under Law
><ATTORNEY> <FILE-NUMBER>98-204
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><DESCRIPTION> <NOTIFY>Leslie Gross
><TEXT>
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>=09=09=09=09=09April 15, 1999
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>Hon. Magalie Roman Salas
>Office of the Secretary
>Federal Communications Commission
>445 Twelfth Street., S.W.
>TW-A306
>Washington, DC 20554
>
>
>=09RE:=09Docket No. 98-204 and 96-16. Reply Comments on the Federal
>Communications Commission's Proposed Revisions of Its Broadcast and Cable
>Equal Employment Opportunity Rules and Policies
>
>Dear Ms. Salas:
>
>=09The attached document sets forth the reply comments of the Lawyers'
>Committee for Civil Rights Under Law, regarding the Federal Communications
>Commission's (FCC) proposed regulation, "Revision of Broadcast and Cable
>EEO Rules and Policies" 63 Fed. Reg. 230 (1998) (to be codified at 47 CFR
>Parts 0, 73 and 76) (proposed November 19, 1998), which would revise the
>Commission's equal employment opportunity regulations.
>
>=09Thank you for the opportunity to reply to comments on the proposed
>regulations. If we can be of any further assistance, please do not hesitate
>to contact us.
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>=09=09=09=09=09Respectfully Submitted,

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>=09=09=09=09=09Barbara Arnwine

>=09=09=09=09=09Executive Director

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>=09=09=09=09=09Thomas J. Henderson

>=09=09=09=09=09Director of Litigation

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>=09=09=09=09=09Leslie M. Gross

>=09=09=09=09=09Staff Attorney=0CBEFORE THE FEDERAL COMMUNICATIONS COMMISSION

>

>REPLY COMMENTS OF

>THE LAWYERS' COMMITTEE FOR CIVIL RIGHTS UNDER LAW

>REGARDING THE

>FEDERAL COMMUNICATIONS COMMISSION'S PROPOSED REVISIONS OF ITS BROADCAST AND

>CABLE EQUAL EMPLOYMENT OPPORTUNITY RULES AND POLICIES

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>April 15, 1999=0CIntroduction

>=09The Lawyers' Committee for Civil Rights Under Law was founded in 1963 by
>the leaders of the American bar, at the request of President Kennedy, in
>order to help defend the civil rights of minorities and the poor. Its Board
>of Trustees is composed of many of the nation's leading lawyers, including
>past Attorneys General of the United States, several past Presidents of the
>American Bar Association, and law school deans and professors. Through the
>Committee and its independent local affiliates, thousands of attorneys have
>represented hundreds of thousands of clients in civil rights cases across
>the country, including a large number of cases challenging racial
>discrimination in employment.
>=09The Committee recognizes the proposed regulations as a determined effort by
>the Commission to address the continuing compelling need for the government
>to prevent and eliminate discrimination in the broadcast and cable industry.
>Prevention of discrimination in employment in the broadcast industry is
>consistent with and a necessary element of the Federal Communication
>Commission's ("FCC" or "Commission") contribution to achieve the important
>national policy of eliminating discrimination. Such efforts are particularly
>important where data reveals possible systemic discrimination. Available
>empirical evidence suggests that women and racial minorities are
>under-represented in both entry level and higher level positions. Because
>women and minorities face barriers in both initial hiring and promotion, the
>Commission must implement regulations that address discrimination in both
>hiring and employment. We applaud the Commission's efforts to tailor an
>Equal Employment Opportunity (EEO) program and its implementation more
>precisely to the objective of preventing discrimination.
>=09In its reply comments, the Committee addresses those previously filed
>comments that critique the constitutionality of the FCC's proposed EEO
>regulations. While we recognize the importance of addressing critiques of
>specific proposed EEO regulations, we emphasize the broader issues
>concerning the bases for and conformity with appropriate standards under
>which these regulations should be reviewed. First, we discuss the FCC's
>authority to promulgate EEO rules. Second, we address whether the FCC's
>proposed outreach, recruitment, and statistical tracking efforts trigger
>strict scrutiny. Finally, we discuss whether the proposed rules, if subject
>to strict scrutiny, pass Constitutional muster.

>

> I. =09The FCC Has the Authority to Promulgate EEO Rules

>=09The FCC unquestionably has the authority to promulgate equal employment
>opportunity rules. Congress clearly has authorized the promulgation of such
>rules. Such rules further the compelling government interest of
>non-discrimination. In addition, the promulgation of EEO rules allows the
>FCC to deny those who discriminate, ownership in the broadcast spectrum, a
>scarce and valuable public resource.
>=09Congress has explicitly defined the FCC's charge, stating that it has
>created the Commission "[f]or the purpose of regulating interstate and
>foreign commerce in communication by wire and radio so as to make available,
>so far as possible, to all the people of the United States, without
>discrimination on the basis of race, color, religion, national origin, or
>sex, a rapid, efficient, Nation-wide, and world-wide wire, and radio
>communication service..." (emphasis added) 47 U.S.C. =A7 151 (1996).
>=09The FCC's EEO rules are consistent with the Commission's congressional
>mandate to regulate in the public interest. 47 U.S.C. =A7 309(a)(1994). As
>the Supreme Court has stated, the use of the words "public interest" in a
>regulatory statute is not a broad license to promote the general public
>welfare. Rather, the words take meaning from the purposes of the regulatory

>legislation. NAACP v. Federal Power Commission, 425 U.S. 662, 668 (1976)
>(holding that due to the agency's very narrow statutory purpose, the Federal
>Power Commission ("FPC") did not have the authority under its public
>interest Congressional mandate to promulgate rules prohibiting those it
>regulated from engaging in discriminatory employment practices). The FCC's
>mandate, unlike the FPC's, authorizes the Commission to promulgate rules
>that further the compelling interest of non-discrimination. Id. at 670 n. 7.
> Ensuring non-discrimination through EEO rules appropriately implements the
>FCC's charge to ensure that those who provide communication service do so on
>a nondiscriminatory basis. The FCC EEO rules require employers to conduct
>outreach and recruitment actively on a non-discriminatory basis as a part of
> an EEO policy, therefore appropriately addressing a common means through
>which discrimination is accomplished.

>=09The FCC's explicit statutory mandate to address discrimination in the
>industry is in addition to previously established Commission authority to
>address discrimination through its evaluation of applicants for licenses and
>license renewals. In keeping with its mandate to regulate in the public
>interest, Congress has obligated the FCC to grant licenses only to those who
>responsibly hold their positions of public trusteeship. The Supreme Court
>has long recognized that when given the authority by Congress, regulatory
>agencies have the power to regulate the use of scarce and valuable
>resources. See FCC v. League of Women Voters, 468 U.S. 364, 376 (1984).
>This authority for oversight extends to non-discrimination in the use of
>radio and broadcast frequencies. Id. The Court of Appeals for the District
>of Columbia has held that discrimination by a licensee or potential licensee
>was an appropriate factor to consider in weighing the question of whether it
>could act as a responsible public trustee. Bilingual Bicultural Coalition on
>Mass Media v. FCC, 595 F.2d 621 (D.C. Cir. 1978) (Bilingual II). In
>Bilingual II, the Court noted that "from the outset, the Commission has
>recognized that the public interest is not served by licensees who engage in
>intentional employment discrimination." Bilingual II at 628. Clarifying the
>FCC's role in ensuring equal employment opportunity, the Court of Appeals
>explained that "the FCC functions very differently from the EEOC, both in
>the type of inquiries it makes and in the types of sanctions it can impose.
>The EEOC aims primarily to remedy the effects of past discrimination... The
>FCC, by contrast, is concerned primarily with the future..." Id.
>Accordingly, the Commission's proposed EEO rules are appropriately grounded,
>as well, in its obligation to assess the character of would be licensees.
>=09Clearly, the FCC has the authority to promulgate EEO rules to prevent
>discrimination by licensees. Congress has explicitly directed the agency to
>take such action. Courts have recognized that authority. The Commission's
>efforts to ensure non-discrimination through EEO rules unquestionably
>furthers the FCC's mandate to regulate in the public interest.

>

>II. =09Whether the FCC's Proposed Outreach, Recruitment, and Statistical
>Tracking =09Efforts Trigger Strict Scrutiny
>=09Strict scrutiny analysis does not apply to the FCC's non-discrimination
>rules, including proposed outreach, recruitment, and statistical
>record-keeping efforts. Contrary to the suggestions of some commentators,
>the courts support non-discrimination regulations not resulting in racial
>classifications that demand strict scrutiny to determine if they conform to
>the Constitution. The EEO program proposed by the FCC in its NPRM does not
>create any racial classifications that would trigger strict scrutiny. The
>Supreme Court reserves that standard of review for instances other than
>where race is considered only to prevent identify, or monitor
>discrimination. The Court reviews programs under strict scrutiny where race

> serves as a factor in a decision-making process. For example, the
> government program at issue in *Adarand Constructors v. Peña*, 515 U.S. 200
> (1995), used race as a factor in determining which businesses received
> contracting awards. The program gave financial incentives to businesses to
> hire subcontractors certified as small Disadvantaged Business Enterprises
> (DBEs). In reviewing the DBE program, the Supreme Court held that
> Congressionally-authorized race-conscious affirmative action programs are
> subject to strict scrutiny, noting that "whenever the government treats any
> person unequally because of his or her race, that person has suffered an
> injury that falls squarely within the language and spirit of the
> Constitution's guarantee of equal protection," *Id.* at 229-230.
> =09Likewise, the program challenged in *City of Richmond v. J.A. Croson*, 488
> U.S. 469 (1989), used race as a factor in determining which businesses
> earned contracts. In *Croson*, the challenged program required prime
> contractors to whom the city awarded construction contracts to subcontract
> at least 30 percent of the dollar amount of the contract to one or more
> Minority Business Enterprises (MBEs)— a so-called "set-aside". *Id.* at 477.
> Like other racial classifications reviewed by the Court under strict
> scrutiny, this program resulted in participants of particular races
> receiving different favorable treatment within the program.
> =09In contrast, the non-discrimination regulations, including the outreach and
> recruitment measures proposed by the Commission do not treat persons
> unequally because of their race. These regulations identify race or have
> broadcasters act with an awareness of race in an effort to assure lawful
> treatment of persons of all races . These regulations do not create
> classifications for or of particular races and do not provide, require, or
> encourage more or less favorable treatment of any particular race.
> Non-discrimination regulations dictate precisely the opposite: that all
> persons must be provided equal opportunities on the basis of their race.
> Only those programs that use race as a factor in determining how program
> participants are treated differently are reviewed under strict scrutiny.
> Such programs do not merely refer to race— they use race as a factor in a
> decision-making process. Opponents of the FCC's proposed outreach and
> recruitment methods have failed to demonstrate how the Commission's proposed
> requirements would influence an employer's hiring decisions. As noted in
> *Lutheran Church-Missouri Synod*, 141 F.3d 344, 351 (D.C. Cir. 1998), in
> determining whether strict scrutiny applies to EEO programs, the issue "is
> whether they oblige stations to grant some degree of preference to
> minorities in hiring." Unlike the programs and policies reviewed by the
> Supreme Court under strict scrutiny, the FCC's proposed EEO policies do not
> require race-conscious decision-making and therefore should not be subjected
> to a heightened standard of review.
> =09With its EEO rules, the Commission is using information as a means of
> identifying circumstances that may indicate the presence of discrimination
> and warrant further examination. The proposed regulations require that
> broadcasters adopt nondiscriminatory employment policies and practices. Such
> efforts help to ensure that broadcasters do not exclude applicants from
> their recruitment and interviewing pools on the basis of their race or
> gender. The value of such reporting is that it enables individual
> broadcasters to engage in an examination of its policies and it enables the
> FCC to assess the prevalence of discrimination in the communications
> industry as a whole. The goal of outreach and recruitment policies is to
> ensure that licensees use broad efforts to ensure that they are making
> employment decisions on a nondiscriminatory basis. Such policies do not
> result in the use of race as a factor in a decision-making process and such
> policies do not trigger the heightened scrutiny that other commentators

>suggest.

>=09The United States Department of Justice echoed this sentiment, when in its
>post-Adarandreview of federal programs, it concluded that outreach and
>recruitment aimed at minorities and women would not be subject to strict
>scrutiny. See Walter Dellinger, Assistant Attorney General, Office of Legal
>Counsel, U.S. Department of Justice, Memorandum to General Counsels at 7
>(June 28, 1995). The Attorney General concluded that "mere-outreach and
>recruitment efforts, however, typically should not be subject to the Adarand
>standards." Id. The Department of Justice reasoned that because race or sex
>was not a factor in any actual employment decisions, strict scrutiny would
>not apply.

>=09Post Croson, courts have made it clear that Adarand standards do not apply
>to outreach and recruitment efforts. Courts instead have viewed such efforts
>as a race-neutral means of increasing minority opportunity. See Raso v.
>Lago, 135 F.3d 11, 16 (1st Cir.) (reading Adarand as applicable to a
>"government standard, preferentially favorable to one race or another, for
>the distribution of benefits"), cert. denied, ___ U.S. ___ (1998); Peightal
>v. Metropolitan Dade County, 26 F.2d 1545, 1557-58 (11th Cir. 1994)
>(treating such recruiting and out-reach efforts as "race-neutral"); Billish
>v. City of Chicago, 962 F.2d 1269, 1290 (7th Cir. 1992), vacated on other
>grounds, 989 F.2d 890 (7th Cir.) (en banc) (1993); Coral Constr. Co. v. King
>County, 941 F.2d 910, 923 (9th Cir. 1991), cert. denied, 502 U.S. 1033
>(1992). The Court of Appeals for the Eleventh Circuit addressed the issue
>more recently in Allen v. Alabama State Board of Education, holding that
>strict scrutiny analysis was not applicable to race-conscious measures used
>to test the fairness of a teaching examination administered by the State
>Board of Education. Allen v. Alabama State Bd. of Educ., 164 F.3d 1347,
>1352-53 (11th Cir. 1999). When addressing the appropriate standard of review
>for race-conscious outreach measures, the Court of Appeals explained:
> Adarand's strict scrutiny standard is plainly applicable where the
>government burdens or benefits along racial lines, granting a preference or
>imposing a penalty to individuals because of their race. Adarand teaches us
>that strict scrutiny applies in such instances because the government has
>subjected individuals to unequal treatment based on race.... By contrast,
>where the government does not exclude persons from benefits based on race,
>but chooses to undertake outreach efforts to persons of one race, broadening
>the pool of applicants, but disadvantaging no one, strict scrutiny is
>generally inapplicable." Id.

>
> =09The gathering of race-conscious information is integral to the FCC's
>ability to successfully fulfill its mandate to regulate in the public
>interest. Such information gathering allows the FCC to determine its
>success in promoting non-discrimination.

>=09Outreach and recruitment further the FCC's mandate of non-discrimination by
>preventing word-of mouth recruitment practices that can discriminate against
>applicants of a particular race, national origin, or gender. See United
>States v. Detroit Edison Co., 365 F. Supp. 87 (E.D. Mich. 1973) rev'd on
>other grounds, 515 F.2d 301 (6th Cir. 1975) (holding that an employer's
>reliance on referrals of friends and relatives by incumbent employees, 92%
>of whom were white, was a failure to hire and a limiting of applicants for
>employment which adversely affected their opportunities because of race);
>See also EEOC v. Metal Service Co., 892 F.2d 341, 350 (1990); Barnett v.
>W.T. Grant Co., 518 F.2d 543, 549 (4th Cir. 1975); Parham v. Southwestern
>Bell Tel. Co., 433 F.2d 421, 426-427 (8th Cir. 1970).

>=09The court followed the same maxim in Monterey Mechanical Co. v. Wilson, 125
>F.3d 702, 710-11 (9th Cir. 1997). In Monterey, the Ninth Circuit reversed a

>denial of a preliminary injunction to an unsuccessful bidder for a
>construction project at a state university. In the underlying action, the
>bidder had brought suit against the university trustees and the successful
>bidder, alleging that a state statute that required general contractors to
>subcontract percentages of their work to subcontractors owned by women or
>minorities, or demonstrate a good faith effort to do so, violated the Equal
>Protection Clause. In considering the good faith outreach provisions of the
>statute, the Ninth Circuit acknowledged that some outreach programs are
>nondiscriminatory, do not subject anyone to unequal treatment, and thus
>>would not implicate the Equal Protection Clause as construed in *Adarand*.
>*Monterey*, 125 F.3d at 711. Such an outreach program might, for example,
>"[r]equir[e] that advertisements for bids be distributed in such a manner to
>assure that all persons, including women-owned and minority-owned firms,
>have a fair opportunity to bid." *Id.*

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>III.=09In Any Event, Race-Conscious Outreach and Recruitment Efforts Satisfy
>the =09Compelling Government Interest of Ensuring Non-discrimination
>=09In any event, race-conscious outreach and recruitment efforts undoubtedly
>satisfy the compelling government interest of ensuring non-discrimination.
>To withstand strict scrutiny, the use of racial classifications must satisfy
>a compelling government interest, and be narrowly tailored to serve that
>interest. *Adarand*, 515 U.S. at 235-237; *Croson* 488 U.S. at 493, 507. As the
>Supreme Court stated in *United States v. Paradise* "[t]he Government
>unquestionably has a compelling interest in remedying past and present
>discrimination by a state actor." (emphasis added) 480 U.S. 149, at 166
>(1987). The FCC's EEO policies serve to prevent these ills, promoting
>non-discrimination through activities that fall squarely within the
>Commission's public interest mandate. See *Beaumont Branch of the NAACP v.*
>*FCC*, 854 F.2d 501, 506 (D.C. Cir. 1988).
>=09The FCC's proposed program, if properly refined, would be narrowly tailored
>to a compelling government interest. In determining whether a program is
>narrowly tailored, courts look to: 1) the efficacy of alternative remedies;
>2) the duration of the remedy and whether it is subject to periodic review;
>3) program flexibility and the availability of waiver provisions; 4) the
>manner in which race is used; and 5) the effect of the program on
>nonbeneficiaries. *Fullilove v. Klutznick*, 448 U.S. 448 (1980), at 510-516
>(Powell, J. concurring); *Croson*, 488 U.S. at 507- 510; *Paradise* at 171.=09The
>Committee urges the Commission to seize upon this opportunity to improve its
>current prohibitions against employment discrimination and to narrowly
>tailor its programs according to the Supreme Court's guidelines. As
>suggested by others, in making its determinations, the Commission should
>consider all evidence which might be probative of discrimination or other
>EEO violations in hiring and internal promotion. Likewise, the Commission
>should consider probative evidence of a licensee's misconduct at other
>facilities, evidence from individual allegations of discrimination, evidence
>from non-responsive answers or omissions to Form 396, evidence in pleadings
>or in responses to Commission inquiries, and evidence of EEO efforts.
>=09The Committee agrees with the Commission that inclusive recruitment is
>integral to any non-discrimination policy. Unfortunately, the Commission's
>proposal affords entities too much discretion in determining how to conduct
>recruitment efforts. The lack of specificity in this portion of the NPRM
>undermines the Commission's overall goal of ensuring equal employment
>opportunity. In addition, the Committee feels that recruitment should not be
>limited to upper management positions only, since lower level employees

>typically advance into upper level positions after gaining on the job
>experience.

>=09To ensure that employers are utilizing sources that effectively recruit
>qualified persons of each race, national origin, or gender not fairly
>represented in the workforce, we urge the Commission to require employers to
>substitute different specific sources if the original sources repeatedly
>fail to refer qualified women and minority applicants for vacancies. In
>order to ensure maximum program flexibility, the Commission should allow
>reviewers of an employer's EEO program to use discretion when an entity
>departs from the above described recruiting process-- yet has succeeded in
>attracting a broad cross section of qualified applicants for consideration.
>This option is preferable to the NPRM's suggestion to use women and minority
>specific sources in numbers proportional to the number of women and
>minorities in the applicable labor pool. While this option might increase
>the number of women and minority recruitment sources required for
>broadcasters whose stations are located in areas with a high percentage of
>women and minorities in the local labor force, it may not be narrowly
>tailored to the goal of effectively disseminating information to qualified
>women and minority applicants. While an increased number of sources may
>increase the chance of qualified applicant referrals, it does not ensure the
>actual referrals of such applicants. Therefore, it appears that the former
>option is more narrowly tailored to the objective of effectively overcoming
>the ill-effects of word of mouth recruitment.

>=09 The Committee endorses an EEO effort that respects the beliefs of
>religious broadcasters while, at the same time, discourages broadcasters
>from discriminating on an other than religious basis. To this end, the
>religious broadcasters should be required to utilize recruitment sources
>that effectively refer qualified applicants of each race, national origin,
>and gender, and when applicable, those who are also qualified on the basis
>of their religious affiliation. It is important that the Commission confines
>their religious qualifications to vacancies where religion meets the
>requirements of a Bona Fide Occupational Qualification ("BFOQ") under Title
>VII..

>=09Employers should conduct continual self assessment in order to ensure they
>have effective EEO programs. In determining how often employers should
>conduct such a review, the Commission must balance the employer's need for
>flexibility with the employee's need for oversight. All employers should
>conduct an internal assessment at least once a year of their efforts to
>recruit, hire, and promote in a nondiscriminatory manner. In addition, they
>should discuss any difficulties they have had in implementing their EEO
>programs.

>=09The Committee agrees that it is necessary to conduct enforcement on an
>ongoing basis through random audits to ensure compliance. The Commission
>should sanction employers whose efforts fail to comply with the
>record-keeping and recruitment guidelines outlined in the NPRM. Entities
>should be required to certify that they have replaced unproductive
>recruiting sources. A probationary period should follow employers' repeated
>EEO failures, in which they are monitored more closely by the Commission and
>given the increased guidance and support that will allow the employers to
>comply with the Commissions guidelines.

>Conclusion

>=09While the proposed regulations appear to embrace inclusive outreach
>efforts, there are, at the same time, defects which appear to undermine some
>of the more constructive elements of the Commission's previous EEO program.
>In general, some provisions appear to be in conflict with the Commission's
>stated desire to ensure that every qualified candidate has an equal

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